

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

Valerie Hicks)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:22-cv-00167-CDP
)	
MENARD, INC.,)	
)	
Defendant.)	
)	

JOINT MOTION TO AMEND THE SCHEDULING ORDER

COME NOW the parties, by and through undersigned counsel, and submit the following Joint Proposed Amended Scheduling Order for the Court's consideration.

All discovery must be completed by November 30, 2022. Any written discovery requests shall be served by a date that allows the served party the full thirty (30) days as provided by the Federal Rules of Civil Procedure in which to answer or produce by the discovery cut-off date.

The parties believe referral of the action to mediation may be useful after the parties have taken depositions. The parties propose that mediation, if ordered, shall be completed by November 30, 2022.

- a) All dispositive motions and motions to exclude testimony pursuant to *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993) or *Kuhmo Tire Co., Ltd. v. Carmichael*, 526 U.S. 137 (1999) shall be filed by December 7, 2022.
- b) The earliest date by which this case should reasonably be expected to be ready for trial is June 2023.
- c) The estimated length of time expected to try the case to verdict is four to five days.

RESPECTFULLY SUBMITTED,

OTT LAW FIRM

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 23rd, 2021, a true and accurate copy of the above and foregoing was e-filed with the Court which sent notification to all parties entitled to service.

/s/ Mark Edward Blankenship Jr.
Attorney for Plaintiff Valerie Hicks